

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

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*County of Summit, et al. v. Purdue
Pharma L.P., et al;* Case No. 1:18-
op-45090

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DECLARATION OF MARK P. CHALOS
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO MALLINCKRODT
PLC's MOTION TO DISMISS FOR LACK
OF PERSONAL JURISDICTION**

I, Mark P. Chalos, declare as follows:

1. I am the managing partner of the Nashville office of the law firm Lieff Cabraser Heimann & Bernstein, LLP. I have personal knowledge of the facts set forth herein and could competently testify to them if called upon to do so.

2. Attached hereto as Exhibit 1 is a true and correct copy of the *ARCOS Registrant Handbook-Section 5.0 - Transaction Record*, U.S. D.O.J.,

<https://www.deadiversion.usdoj.gov/arcos/handbook/section5.htm#1>.

3. Attached hereto as Exhibit 2 is a true and correct copy of ARCOS data summaries prepared by Plaintiff's expert.

4. Attached hereto as Exhibit 3 is a true and correct copy of Distributor Totals from MNK-T1_0007897646.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of Mallinckrodt plc's 2017 10-K form reported to the SEC.

6. Attached hereto as Exhibit 5 is a true and correct copy of Hugh O'Neill's March 13, 2019 Deposition Transcript.

7. Attached hereto as Exhibit 6 is a true and correct copy of the court's Order Denying Mot. to Dismiss at 2, *Commonwealth of Kentucky ex. rel. Andy Beshear v. Mallinckrodt plc, Mallinckrodt LLC, SpecGx LLC*, C.A. No. 18-CI-0381, Franklin Circuit Court, Kentucky (Jan. 22, 2019).

8. Attached hereto as Exhibit 7 is a true and correct copy of Second Supplemental Expert Report of Craig J. McCann, Ph.D., CFA (Apr. 15, 2019).

9. Attached hereto as Exhibit 8 is a true and correct copy of Ronald Wickline's November 13, 2018 Deposition Transcript.

10. Attached hereto as Exhibit 9 is a true and correct copy of a Mallinckrodt plc Press Release entitled "Mallinckrodt Advocates for Comprehensive, Multi-Prong Action Plan to Fight Opioid Abuse and Misuse in the United States" dated September 22, 2017.

11. Attached hereto as Exhibit 10 is a true and correct copy of a letter from Counsel for Mallinckrodt plc to the SEC dated March 7, 2018 responding to a shareholder demand to require the board to report on Mallinckrodt plc's response to the opioid epidemic.

12. Attached hereto as Exhibit 11 is a true and correct copy of a Mallinckrodt plc Press Release entitled "Mallinckrodt plc Receives FDA Approval for XARTEMIS XR (oxycodone hydrochloride and acetaminophen) Extended-Release Tablets (CII)" dated March 14, 2014 8:30 a.m.

13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of Lynn Phillips' February 12, 2019 Deposition Transcript.

14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of Jeffrey Kilper's February 6, 2019 Deposition Transcript.

15. Attached hereto as Exhibit 14 is a true and correct copy of Exhibit 25 to Jeffrey Kilper's February 6, 2019 Deposition.

16. Attached hereto as Exhibit 15 is a true and correct copy of Exhibit 31 to Jeffrey Kilper's February 6, 2019 Deposition.

17. Attached hereto as Exhibit 16 is a true and correct copy of Mallinckrodt plc's 2016 10-Q reported to the SEC.

18. Attached hereto as Exhibit 17 is a true and correct copy of a Mallinckrodt plc Press Release entitled "Mallinckrodt Plans Spin-Off of Specialty Generics Business to Shareholders" dated December 6, 2018.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Nashville, Tennessee this the 21st day of June, 2019.



Mark P. Chalos

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2019, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

DATED: June 21, 2019

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser